



"A Great Place to Learn"

PITTSYLVANIA COUNTY SCHOOLS

Dr. Mark R. Jones
Division Superintendent

P.O. Box 232 • 39 Bank Street S.E. • Chatham, VA 24531

July 25, 2019

Mr. Ajit Pai
Chairman
Federal Communications Commission
445 12th Street SW,
Washington, DC 20554

Dear Chairman Pai:

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate. Before delving into my response to the proposed changes, I want to thank the FCC for its continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools to obtain affordable telecommunications and internet access.

Pittsylvania County Schools serves a large, rural and high-poverty county that covers an area the size of Rhode Island. Needed Category 1 E-Rate dollars are used to provide internet access and conduit transport for network traffic across 21 schools. Category 2 E-Rate dollars have been used to update the infrastructure to support the ever increasing demand for faster internet and network traffic throughout the division. Instructional practices rely on our ability to continue to provide this access.

The E-Rate program and the broader USF program combine to form a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role in the rapid and significant expansion of connectivity in schools, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

I have great concern about the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care

providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband). A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—creates great uncertainty. I hope that the FCC continues to support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

E-Rate funding is critical for Pittsylvania County Schools. We have used these funds as indicated below.

- a. E-Rate funding has enabled our school division to upgrade our network to accommodate the ever increasing instructional demands. These funds allowed for the first systematic and complete upgrade to our core switches ever.*
- b. E-Rate funding was the critical source to make a build out possible. That is, without the E-Rate dollars/discount, the connectivity/build out would have been out of reach/unaffordable.*
- c. In a throwback to the days when funding for priority two was extremely limited, we anticipate that with little certainty that funding for internal connections would be available, schools and libraries would be discouraged from planning for support for internal connections. When E-Rate dollars are competing against rural health care dollars, it introduces budget planning uncertainty, as E-Rate beneficiaries would not be able to be certain of the availability of E-Rate dollars. This budget instability will impact our ability to plan for connectivity needs and build out.*

In closing, I reiterate my district's continued, strong support, for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning. Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark R. Jones". The signature is fluid and cursive, with the first name "Mark" and last name "Jones" clearly distinguishable.

Mark R. Jones
Division Superintendent